

MONTGOMERY Y. PAEK, Bar No. 10176  
AMY L. THOMPSON, Bar No. 11907  
DIANA G. DICKINSON, Bar No. 13477  
LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
Suite 300  
Las Vegas, Nevada 89169.5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811  
Email: [mpaek@littler.com](mailto:mpaek@littler.com)  
[athompson@littler.com](mailto:athompson@littler.com)  
[ddickinson@littler.com](mailto:ddickinson@littler.com)

Attorneys for Defendants  
DIAMOND RESORTS INTERNATIONAL, INC.,  
HILTON GRAND VACATIONS INC. AND NOAH  
BLOOM

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LILIANE KELAA,

Plaintiff,

v.

DIAMOND RESORTS INTERNATIONAL,  
INC., a Delaware Corporation; HILTON  
GRAND VACATIONS INC., a Delaware  
corporation as successor-in-interest; NOAH  
BLOOM, an individual; DOES I through X,  
inclusive; and ROE BUSINESS ENTITIES, I  
through X, inclusive,

Defendant.

Case No. 2:22-cv-00554- JAD-BNW

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME FOR DEFENDANTS  
TO FILE ANSWER**

**[FIRST REQUEST]**

Plaintiff LILIANE KELAA (“Plaintiff”) and DIAMOND RESORTS INTERNATIONAL  
MARKETING, INC. (incorrectly identified as Diamond Resorts International, Inc.), HILTON  
GRAND VACATIONS INC., and NOAH BLOOM (collectively “Defendants”), by and through their  
undersigned counsel, hereby agree and stipulate to extend the time for Defendants to file an Answer  
from the current deadline of August 26, 2022, for 2 weeks, up to and including **September 9, 2022**.

On August 16, 2022, the Court held a hearing on Defendants' Partial Motion to Dismiss Plaintiff's Complaint. The Court denied Defendants' motion, and ordered Defendants to file an answer within 10 days. **ECF No. 23.**

The requested extension is necessary because Defendants' counsel is going to be out of the state for work during the week of August 22<sup>nd</sup> and due to the heavy workloads of defense counsel. This is the first request for an extension of time to file an Answer to the Complaint. This request is made in good faith and not for the purpose of delay.

Dated: August 19, 2022

HONE LAW

Dated: August 19, 2022

LITTLER MENDELSON, P.C.

*/s/ Kathryn Newman, Esq.*

JILL GARCIA, ESQ.  
AMY L. HOWARD, ESQ.  
KATHRYN NEWMAN, ESQ.

*/s/ Diana G. Dickinson, Esq.*

MONTGOMERY Y. PAEK, ESQ.  
AMY L. THOMPSON, ESQ.  
DIANA G. DICKINSON, ESQ.

Attorneys for Plaintiff  
LILIANE KELAA

Attorneys for Defendants  
DIAMOND RESORTS INTERNATIONAL,  
INC., HILTON GRAND VACATIONS INC.  
AND NOAH BLOOM

**IT IS SO ORDERED.**

Dated: August 22, 2022

  
UNITED STATES MAGISTRATE JUDGE

4857-2177-0287.1 / 104088-1025